

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>KENNETH THOMPSON,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Ken Rock,"</b>	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to possess</b>
<b>a/k/a "KR,"</b>	<b>:</b>	<b>with intent to distribute cocaine and</b>
<b>ROMEL BOLGER,</b>	<b>:</b>	<b>cocaine base (crack) - 1 count)</b>
<b>a/k/a "Romez Bolger,"</b>	<b>:</b>	<b>21 U.S.C. § 856 (maintaining a house for</b>
<b>a/k/a "Big Hommie,"</b>	<b>:</b>	<b>drug trafficking - 1 count)</b>
<b>a/k/a "BH,"</b>	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession with</b>
<b>a/k/a "Damir Miller,"</b>	<b>:</b>	<b>intent to distribute controlled substances</b>
<b>a/k/a "James McCarty,"</b>		<b>- 2 counts)</b>
<b>a/k/a "Charles Connor,"</b>		<b>18 U.S.C. § 924(c)(1) (possession of a</b>
<b>LATOYA JOHNSON KIRKLAND</b>		<b>firearm in furtherance of a drug</b>
		<b>trafficking crime - 1 count)</b>
		<b>18 U.S.C. § 922(g)(1) (possession of a</b>
		<b>firearm by a convicted felon - 1 count)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1.       Beginning in or about early November 2006, and continuing to on or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor,"  
LATOYA JOHNSON KIRKLAND**

conspired and agreed, together and with others known and unknown to the grand jury: (1) to knowingly and intentionally possess with intent to distribute five kilograms or more, that is, approximately 61 kilograms, of a mixture and substance containing a detectable amount of cocaine, and 50 grams or more, that is, approximately 131 grams, of a mixture and substance containing a detectable amount of cocaine base, also known as "crack," Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and (2) to maintain and control a house for drug trafficking, in violation of Title 21, United States Code, Section 856, and Title 18, United States Code Section 2.

**MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendants KENNETH THOMPSON, a/k/a "Ken Rock," a/k/a "KR," ("THOMPSON"); ROMEL BOLGER, a/k/a "Romez Bolger," a/k/a "Big Hommie," a/k/a "BH," a/k/a "Damir Miller," a/k/a "James McCarty," ("BOLGER"); and LATOYA JOHNSON KIRKLAND ("KIRKLAND"), and others known and unknown to the grand jury, possessed wholesale and retail amounts of cocaine and cocaine base ("crack cocaine") for distribution in Philadelphia, Pennsylvania and elsewhere.

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its objects, defendants THOMPSON, BOLGER, and KIRKLAND, and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about September 25, 2006, defendant KIRKLAND paid approximately \$5,370 using cash and money orders to enter into a one-year lease to reside at 1053 Levick Street in Philadelphia, Pennsylvania.

In or about the Fall of 2006:

2. After defendant KIRKLAND entered into the lease agreement for 1053 Levick Street, defendant THOMPSON moved in with defendant KIRKLAND and occupied the middle upstairs bedroom.

3. Defendant BOLGER regularly visited defendants KIRKLAND and THOMPSON at 1053 Levick Street, and together defendants THOMPSON, BOLGER, and KIRKLAND used the basement of 1053 Levick Street to store cocaine and crack cocaine for distribution.

4. Defendants THOMPSON, BOLGER, and KIRKLAND used drug paraphernalia to manufacture crack cocaine and to assist in the packaging of the cocaine and crack cocaine for distribution.

On or about November 25, 2006:

5. Defendants THOMPSON and BOLGER, and others unknown to the grand jury were involved in a shoot-out outside of 1053 Levick Street.

6. Inside the 1053 Levick Street residence at the time of the shooting, defendants THOMPSON, BOLGER, and KIRKLAND stored and maintained the following items in furtherance of their drug trafficking, including but not limited to:

- a. approximately 61 kilograms of cocaine;
- b. approximately 131 grams of crack cocaine;
- c. drug paraphernalia including, scales, a pot, strainer; jars with butterfly lids, a Black & Decker heat sealer; and various drug packaging materials;
- d. a drug tally notebook;
- e. the following four firearms and ammunition:
  - (1) a Springfield Armory Ultra Compact .45 caliber handgun with obliterated serial number;
  - (2) a Dan Wesson Arms .357 revolver, serial number 254640;
  - (3) a silver & black 9mm Beretta handgun and magazine with an obliterated serial number handgun; and
  - (4) a Taurus PT 745 .45 caliber handgun serial number NYA52330, loaded with three rounds; and
- f. approximately \$176,365 in U.S. currency.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

## **COUNT TWO**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 2 of the Manner and Means and paragraphs 1 through 6 of the Overt Acts of Count One of this indictment are incorporated here.

2. On or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor,"  
LATOYA JOHNSON KIRKLAND**

managed and controlled, and aided and abetted the management and control of, the house located at 1053 Levick Street in Philadelphia, as a lessee and occupants, and knowingly and intentionally made available for use this house for the purpose of unlawfully storing and distributing, one or more of the following controlled substances, that is, 5 kilograms or more, that is approximately 61 kilograms, of a mixture and substance containing a detectable amount of cocaine, and 50 grams or more, that is, approximately 131 grams, of a mixture and substance containing a detectable amount of cocaine base, also known as "crack," Schedule II controlled substances.

In violation of Title 21, United States Code, Section 856(a)(2) and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, five kilograms or more, that is, approximately 61 kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 50 grams or more, that is, approximately 131 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor"**

knowingly possessed, and aided and abetted the possession of, a firearm, that is: (1) a Springfield Armory Ultra Compact .45 caliber handgun with obliterated serial number; (2) a Dan Wesson Arms .357 revolver, serial number 254640; (3) a silver & black 9mm Beretta handgun and magazine with an obliterated serial number handgun; and (4) a Taurus PT 745 .45 caliber handgun serial number NYA52330, loaded with three rounds, in furtherance of a drug trafficking crime for which they may be prosecuted in a Court of the United States, that is, conspiracy to possess with intent to distribute a controlled substance and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and 2.



**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 25, 2006, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

**KENNETH THOMPSON,  
a/k/a “Ken Rock,”  
a/k/a “KR,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, (1) a Springfield Armory Ultra Compact .45 caliber handgun with obliterated serial number; (2) a Dan Wesson Arms .357 revolver, serial number 254640; (3) a silver & black 9mm Beretta handgun and magazine with an obliterated serial number handgun; and (4) a Taurus PT 745 .45 caliber handgun serial number NYA52330, loaded with three rounds.

In violation of Title 18, United States Code, Sections 922(g)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

**FORFEITURE - 21 U.S.C. § 853**

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this indictment, defendants

**KENNETH THOMPSON,  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
ROMEL BOLGER,  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty"  
a/k/a "Charles Connor,"  
LATOYA JOHNSON KIRKLAND**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

- (1) a Springfield Armory Ultra Compact .45 caliber handgun with obliterated serial number;
- (2) a Dan Wesson Arms .357 revolver, serial number 254640;
- (3) a silver & black 9mm Beretta handgun and magazine with an obliterated serial number handgun; and
- (4) a Taurus PT 745 .45 caliber handgun serial number NYA52330, loaded with three rounds.

(b) any property constituting, or derived from, proceeds obtained

directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$176,365.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

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**FORFEITURE - 18 U.S.C. § 924(d)**

3. As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), set forth in this indictment, defendants

**KENNETH THOMPSON,**  
a/k/a "Ken Rock,"  
a/k/a "KR,"  
**ROMEL BOLGER,**  
a/k/a "Romez Bolger,"  
a/k/a "Big Hommie,"  
a/k/a "BH,"  
a/k/a "Damir Miller,"  
a/k/a "James McCarty,"  
a/k/a "Charles Connor"

shall forfeit to the United States of America, the firearms involved in the commission of these offenses, including, but not limited to:

- (1) a Springfield Armory Ultra Compact .45 caliber handgun with obliterated serial number;
- (2) a Dan Wesson Arms .357 revolver, serial number 254640;
- (3) a silver & black 9mm Beretta handgun and magazine with an obliterated serial number handgun; and
- (4) a Taurus PT 745 .45 caliber handgun serial number NYA52330, loaded with three rounds.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,  
United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**